

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

TODD DAVIS
657 West Pine Street, #2
Edmore, Michigan 48829

Plaintiff

v.

SHAUN E. MEARS
2200 Mount Zion Road
Tazewell, Tennessee 37879

And

US CORRECTIONS, LLC
Registered Agent: Cogency Global Inc.
212 S. Tryon Street, Ste. 1000
Charlotte, NC 28281

And

PRISONER TRANSPORTATION
SERVICES, INC.
Registered Agent: Davidson Corporate
Services Inc.
511 Union Street, Ste. 1000
Nashville, TN 37219

Defendants

Case Number: _____

COMPLAINT

Plaintiff, Todd Davis, by and through undersigned counsel, hereby sues the Defendants, Shaun E. Mears, US Corrections, LLC and Prisoner Transportation Services, Inc., for the relief prayed herein. In support, Plaintiff alleges as follows:

PARTIES

1. Plaintiff, Todd Davis, is an adult citizen of Michigan, residing at the above-referenced address.

2. Upon information and belief, Defendant Shaun E. Mears (hereinafter “Defendant Driver”), is an adult citizen of Tennessee, residing at the above-referenced address.

3. Upon information and belief, Defendant US Corrections, LLC (hereinafter “Defendant USC”), is a corporate entity formed in the State of North Carolina. Its registered agent in North Carolina is provided above.

4. Upon information and belief, Defendant Prisoner Transportation Services, Inc. (hereinafter “Defendant PTS”), is a corporate entity formed in the State of Tennessee. Its registered agent in North Carolina is provided above.

JURISDICTION

5. Jurisdiction in this case is proper pursuant to 28 U.S.C. § 1332.

COUNT I – NEGLIGENCE
(Defendant Driver)

6. On or about November 25, 2019, Defendant Driver was operating a 2018 Dodge Ram van southbound on I-95, near exit 64, in Baltimore County, Maryland.

7. At that time and place, Defendant Driver was duty bound to operate the vehicle with reasonable care and prudence.

8. Notwithstanding this duty, and in breach thereof, Defendant Driver operated the vehicle in a negligent manner and carelessly struck the rear of a motor vehicle operated by Diana Vasquez. Plaintiff was an occupant in Defendant Driver’s van. Defendant Driver’s negligence consisted of, among other things, failing to pay full time and attention to his driving, failing to maintain a proper lookout, and otherwise failing to operate his vehicle in a reasonable manner.

9. As a direct and proximate result of Defendant Driver's negligence, Plaintiff sustained severe and permanent bodily injuries, has experienced and will continue to experience pain and suffering, has lost and will continue to lose wages and earnings, has incurred and will continue to incur medical and other expenses, has been and will continue to be prevented from engaging in normal social and recreational activities, and has suffered and will continue to suffer other damages.

COUNT II – VICARIOUS LIABILITY
(Defendant USC)

10. Plaintiff references and incorporates the preceding paragraphs, in the same force and effect as if fully re-alleged herein.

11. At all times relevant hereto, Defendant Driver was operating a motor vehicle owned by Defendant USC and was acting as Defendant USC's agent, servant, and/or employee.

12. As Defendant Driver was Defendant USC's agent, servant, and/or employee, Defendant USC is vicariously liable for Defendant Driver's negligence, and Plaintiff's resulting injuries and damages.

COUNT III – VICARIOUS LIABILITY
(Defendant PTS)

13. Plaintiff references and incorporates the preceding paragraphs, in the same force and effect as if fully re-alleged herein.

14. At all times relevant hereto, Defendant Driver was operating a motor vehicle owned by Defendant PTS and was acting as Defendant PTS's agent, servant, and/or employee.

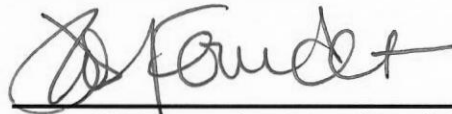
15. At all times relevant hereto, Defendant Driver was an agent, servant and/or employee of Defendant PTS acting within the scope of his employment with Defendant PTS.

16. As Defendant Driver was Defendant PTS's agent, servant, and/or employee, Defendant PTS is vicariously liable for Defendant Driver's negligence, and Plaintiff's resulting injuries and damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Todd Davis, hereby demands judgment against Defendants, Shaun E. Mears, US Corrections, LLC and Prisoner Transportation Services, Inc., jointly and severally, in the amount of ONE MILLION & 00/100 U.S. DOLLARS (\$1,000,000.00), plus costs and interest, along with any other relief this Court deems appropriate.

Respectfully submitted,



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Attorneys for Plaintiff Todd Davis

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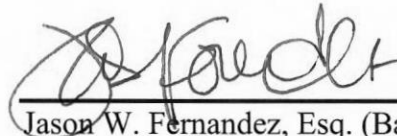
PRISONER TRANSPORTATION
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Registered Agent: Davidson Corporate
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511 Union Street, Ste. 1000
Nashville, TN 37219

Defendants

JURY PRAYER

Plaintiff respectfully prays a jury trial as to all claims alleged herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Fernandez", is written over a horizontal line.

Jason W. Fernandez, Esq. (Bar # 29069)

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